

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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-----X
ASHOT EGIAZARYAN,      )
                        )
      Plaintiff,      )   Civ. Action No.
                        )
      -against-      )   11 CIV 2670
                        )   (PKC) (GWG)
PETER ZALMAYEV,      )
                        )
      Defendant.      )
-----X
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Tuesday, March 20, 2012

- - -

Videotape Deposition of RINAT R.

AKHMETSHIN held in the offices of Greenberg
Traurig, 2101 L Street, Northwest, Washington,
D.C. 20037 commencing at approximately 10:11 a.m.,
on the above date, before Cindy L. Sebo,
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1 RINAT R. AKHMETSHIN

2 I don't remember. Yes, but I started working
3 on the Egiazaryan project, correct.

4 Q. Do you recall generally when
5 that was?

6 A. I think it was around the new
7 year. So it might have been, like, end of
8 2010, early 2011. But I think it was 2011 --

9 Q. How did -- how did --

10 A. -- I do not remember exactly.

11 Q. How did that project come about?

12 A. It was very old client of mine
13 asked me to look into this issue.

14 Q. Who is that?

15 A. His name is Andrey Vavilov.

16 Andrey, A-N-D-R-E-Y, Andrey; last name is
17 Vavilov, V-A-V-I-L-O-V, Vavilov.

18 Q. Who is Andrey Vavilov?

19 A. Andrey Vavilov is a, I would say,
20 personal friend of mine and also a
21 long-standing client.

22 Q. Where does he reside?

23 A. He resides in New York and in
24 Monaco, as far as I'm concerned -- or as far
25 as I know. And I know he has a residence in

1 RINAT R. AKHMETSHIN

2 stay in the United States and get political
3 asylum. And he was really, I would say,
4 disgusted by this.

5 Q. Did he ask you to do something?

6 A. He asked me what could be done to
7 tell the American authorities who -- and
8 American public, first of all, who
9 Ashot Egiazaryan is.

10 Q. Did you then continue to work on
11 this project?

12 A. I discussed this matter with
13 Mr. Vavilov extensively.

14 Q. And did he -- did you ever enter
15 into an agreement with him?

16 A. Yes, I was engaged by
17 Mr. Vavilov.

18 Q. Was there a written engagement
19 between you and Mr. Vavilov?

20 A. Rarely. Since we know each other
21 for such a long time, it's -- I don't think
22 I've ever had a contract with him or anything
23 to that matter.

24 I might have years ago, but from
25 now on, it's just kind of he asked me to do

1 RINAT R. AKHMETSHIN

2 something and I did it for him.

3 Q. And what were the terms by which
4 you agreed to work on a project relating to
5 Mr. Egiazaryan for him?

6 A. What do you mean "terms"?

7 Q. Were you getting paid?

8 A. I was paid, correct, yes.

9 Q. Did you -- at the time when you
10 first met, did you agree on an amount?

11 A. You know, he -- he had some cash
12 around the house, actually. He said that,
13 you know, just so on, so on and so on. I --
14 I think he got some -- I don't remember.

15 He -- he -- he said that, you
16 know, just I got a cash for something,
17 someone owed him money or something like
18 that. I don't remember.

19 But I remember there was money
20 in, like, hundred-dollar bills bags. And,
21 you know, he said that, you know, just -- I
22 mean, he said, I would like to -- you to
23 start this public awareness project in the
24 United States, and he thought how much -- and
25 asked me how much would it cost.

1 RINAT R. AKHMETSHIN

2 Q. What did you say?

3 A. I said that, you know, we could
4 try, you know. I don't know how far it could
5 go, but, you know, I think that we could try
6 and maybe start with \$100,000.

7 Q. Did he give you \$100,000 cash
8 right --

9 A. He did not have --

10 Q. -- then and there?

11 A. -- he did not have \$100,000, but
12 I think he had something like 70 or something
13 like that, 70 or 80. I don't remember.

14 Q. Did he give you \$70,000 cash at
15 that time?

16 A. Cash, correct, yes.

17 I don't remember. 70 or 80,
18 something like that.

19 Q. Is -- is he a Russian citizen --

20 A. Mr. Vavilov?

21 Q. -- Mr. Vavilov?

22 A. I do believe so, yes.

23 Q. Did you ever register under the
24 Foreign Agents Registration Act with regard
25 to this project?

1 RINAT R. AKHMETSHIN

2 Mr. Vavilov is a private citizen,
3 and he lives in the United States, resident
4 of the United States and resident of Russia.
5 So there's absolutely no FARA affiliation.

6 Q. Do you know where Mr. Vavilov
7 got the cash from?

8 A. I don't know. You should ask
9 him.

10 Q. Did Mr. Vavilov say whether
11 there were other individuals or entities who
12 were participating with him in initiating
13 this project against Ashot Egiazaryan?

14 MR. SPERDUTO: Objection to the
15 form.

16 THE WITNESS: Mr. Vavilov hates
17 your client's guts. You know, he
18 doesn't need any organizations. He
19 hates him for --

20 BY MR. COHEN:

21 Q. Did he say --

22 A. -- a dozen years.

23 Q. -- did he say whether he was
24 cooperating with anybody else?

25 A. I don't think so.

1 RINAT R. AKHMETSHIN

2 Peter Zalmayev?

3 A. Because he -- he's a very
4 thorough researcher himself, and I asked
5 for his help in being -- doing this matter.

6 Q. Did you tell him you were going
7 to pay him?

8 A. Yes, I did.

9 Q. Did you tell him who you were
10 being paid by?

11 A. I did, yes.

12 Q. What did you tell him?

13 A. I said that -- and he was aware
14 of Andrey Vavilov. I think he met him
15 before, too. I said it was Mr. Vavilov, yes.

16 Q. Mr. Zalmayev knew from the
17 outset -- outset that Mr. Vavilov was
18 financing this assignment; is that correct?

19 A. That is correct, yes.

20 Q. Did you tell Mr. Zalmayev what
21 his compensation would be for work on the
22 project?

23 A. You know, I thought Mr. Zalmayev
24 could do this project on his own. So I
25 actually was not really planning on doing it

1 RINAT R. AKHMETSHIN

2 A. It might have been one of my
3 summaries.

4 THE COURT REPORTER: Sorry?
5 Summaries?

6 THE WITNESS: It might have
7 been one of my summaries.

8 BY MR. COHEN:

9 Q. One of your summaries?

10 A. Correct, yes.

11 Q. Do you recall when this summary
12 was prepared?

13 A. Probably in 2009 when I was
14 working on this previous matter.

15 Q. And in 2009, your goal was to
16 find out anything negative you could find
17 out about Mr. Egiazaryan; is that correct?

18 A. It was an opposition research,
19 I'll describe it that way.

20 Q. Okay. Well, you were looking
21 for information that would paint
22 Mr. Egiazaryan in a bad light; is that
23 correct?

24 A. I would not put it that way, sir.

25 Q. How would you put it?

1 RINAT R. AKHMETSHIN

2 A. I would like to do full duties of
3 Mr. Egiazaryan's political and other
4 activities.

5 Q. Do you believe that this is a --
6 is this an attempt at a neutral summary of
7 Mr. Egiazaryan's life?

8 A. I would say yes. You know, I
9 just -- I -- I need to review this, sir. I
10 haven't seen it in a long time, yes.

11 Q. And in --

12 A. But I would -- I would -- I would
13 say it's just probably very fair description
14 of his persona.

15 Q. If you had seen something prior
16 to this time that described him as
17 anti-Semitic, you would have included that
18 in here; is that correct?

19 MR. SPERDUTO: Objection to the
20 form; hypothetical.

21 THE WITNESS: I -- at -- at
22 that time, I hadn't -- you know, it
23 crossed my mind that this LDPR, which
24 is deplorable, that truly disgusting
25 organization -- but at that time --

1 RINAT R. AKHMETSHIN

2 BY MR. COHEN:

3 Q. Just an -- answer my question,
4 please, if you had seen something --

5 A. I would have included this.

6 Q. -- if you had seen -- if you had
7 seen something that -- that characterized
8 Mr. Egiazaryan or you believed characterized
9 him as anti-American, you would have
10 included that in here --

11 MR. SPERDUTO: Same
12 objection --

13 BY MR. COHEN:

14 Q. -- is that correct?

15 MR. SPERDUTO: Same objection.

16 BY MR. COHEN:

17 Q. That's a yes, right?

18 A. If I -- if I would have -- if I
19 would had information which reflected that, I
20 might have included it.

21 Q. If you had information that
22 reflected that Mr. Egiazaryan was xenophobic
23 or had taken xenophobic actions or made
24 xenophobic statements, you would have
25 included that; is that correct?

1 RINAT R. AKHMETSHIN

2 MR. SPERDUTO: Same objection.

3 THE WITNESS: It's
4 argumentative. But I -- if I would
5 have established something at that
6 time, I would have probably included
7 that as well --

8 BY MR. COHEN:

9 Q. As -- as --

10 A. -- because I, personally, feel
11 strongly about those things.

12 Q. If you had established at that
13 time that Mr. Egiazaryan had committed war
14 crimes, you would have included that; is
15 that correct?

16 MR. SPERDUTO: Same objection.

17 THE WITNESS: I'm not sure
18 about war crimes, sir --

19 BY MR. COHEN:

20 Q. Okay.

21 A. -- he was -- and I -- I'm not
22 aware of Mr. Egiazaryan's military service
23 ever.

24 Q. If you had established at that
25 time that Mr. Egiazaryan had embezzled

1 RINAT R. AKHMETSHIN

2 Government funds, you would have included
3 that; is that correct?

4 MR. SPERDUTO: Same objection.

5 THE WITNESS: Sir, just
6 what-if, you know, I just -- if I
7 would have found something which was
8 relevant to his case, I would have
9 definitely included it.

10 BY MR. COHEN:

11 Q. At the time that you prepared
12 this document that's Exhibit -- marked as
13 Exhibit 1 -- Number 162, did you have any
14 information or evidence that Mr. Egiazaryan
15 was anti-Semitic?

16 A. I do not recall that.

17 Q. And at that time that you
18 prepared this document that's been marked as
19 Exhibit 162, did you have any evidence or
20 information that Mr. Egiazaryan had taken
21 anti-American actions or made anti-American
22 statements?

23 A. I was not aware of that.

24 Q. At the time you prepared this
25 document that's been marked as Exhibit 162,

1 RINAT R. AKHMETSHIN

2 did you have any information or evidence
3 suggesting that Mr. Egiazaryan had made
4 xenophobic statements or taken xenophobic
5 actions?

6 A. I was not aware of such
7 statements --

8 Q. At the --

9 A. -- or actions.

10 Q. -- at the time you prepared this
11 document, Number 162, had you -- did you
12 have any information or evidence in your
13 possession that Mr. Egiazaryan had committed
14 war crimes?

15 A. I was not aware of those.

16 Q. At the time you made -- prepared
17 the summary that's contained in Exhibit 162,
18 did you have any information or evidence
19 that Mr. Egiazaryan had stolen Chechnya war
20 relief funds?

21 A. I think there's something here if
22 you read it carefully, but there was a
23 paragraph here about his involvement in
24 Chechnya matters.

25 Q. And this -- this memo would

1 RINAT R. AKHMETSHIN

2 contain whatever information you collected
3 on that information; is that correct?

4 MR. SPERDUTO: Objection to the
5 form.

6 THE WITNESS: I wouldn't --
7 sir, this memo is reflecting what I
8 knew at that time --

9 BY MR. COHEN:

10 Q. This memo --

11 A. -- reflects --

12 Q. -- reflects what you knew at
13 that time?

14 A. In summaries, yes.

15 Q. Yes, thank you.

16 And calling your attention to the
17 top of the page in your e-mail to
18 Mr. Zalmayev, you say you need a one-pager
19 pitch for the project?

20 A. Yes.

21 Q. Well, what did -- what are you
22 referring to by that?

23 A. I wanted to write a summary for
24 Mr. Vavilov and for -- for -- relating to our
25 discussion.

1 RINAT R. AKHMETSHIN

2 Q. -- do you recall what you might
3 have been engaged in at this time that
4 resulted in a \$10,000 payment?

5 A. Something of Central Asia,
6 probably.

7 Q. Do you remember seeing --
8 receiving payments directly from
9 Mr. Akhmetshin in 2011?

10 A. I am Mr. Akhmetshin.

11 Q. I'm sorry.
12 With Mr. Zalmayev in 2011?

13 A. He -- I -- I -- I know for a fact
14 he paid me for doing something on the
15 Egiazaryan matter.

16 Q. Do you recall the amount?

17 A. 10- or \$20,000.

18 MR. COHEN: I'll ask the court
19 reporter to mark a copy of a check
20 with Bates Number PZ3856.

21 Give it to counsel.

22 THE WITNESS: Sir.

23 - - -

24 (Whereupon, a copy of check
25 was marked, for identification

1 RINAT R. AKHMETSHIN

2 purposes, as Deposition Exhibit

3 Number 167.)

4 - - -

5 MR. SPERDUTO: Jason, this is

6 167?

7 THE WITNESS: 167, yes.

8 THE COURT REPORTER: Yes.

9 MR. COHEN: 167, yes.

10 THE WITNESS: Thank you.

11 BY MR. COHEN:

12 Q. I assume you've seen this check

13 before?

14 A. I've seen it. I -- I hope I

15 cashed it.

16 Q. It's made out to you?

17 A. Yes.

18 Q. And it's from the Eurasia

19 Democracy Initiative?

20 A. Correct.

21 Q. It says 11 Penn Plaza; is that

22 correct?

23 A. That's what it --

24 Q. Have you --

25 A. -- it says.

1 RINAT R. AKHMETSHIN

2 Q. -- have you ever seen an office
3 that Eurasia Democracy Initiative has at
4 Penn Plaza?

5 A. I do not remember, sir.

6 Q. Why did you receive this check?

7 A. It was -- I think it's in
8 connection to this Egiazaryan matter, yes.
9 It says expenses and consultancy.

10 Q. Why was Mr. Zalmayev paying you
11 on a project that you said you -- that you
12 brought him on to?

13 A. Because this was stuff which I
14 have contributed as being from my expenses
15 and contribution.

16 Q. So sometimes you pay
17 Mr. Zalmayev, and sometimes he pays you?

18 A. When he has a project and he
19 wants me to do something on it, he pays me.
20 When I have a project and I have something
21 for him to do, the same, I pay him.

22 Q. Would you characterize the
23 Ashot Egiazaryan project as Peter Zalmayev's
24 project?

25 A. I would say so, yes.

1 RINAT R. AKHMETSHIN

2 BY MR. COHEN:

3 Q. Do you know Ruben Markarian?

4 A. Oh, yes, yes. That's Ruben.

5 Q. Who -- who is that?

6 A. He is -- he's an attorney for a
7 person whom Mr. Egiazaryan defrauded for
8 large amounts of money. Ruben Markarian.
9 Ruben Markarian.

10 Q. And is that an issue that you've
11 personally investigated, a dispute between
12 Mr. Markarian's client and Mr. Egiazaryan?

13 A. Oh, we definitely looked into
14 this, sir. I did not personally investigate,
15 but I think that we did everything -- we did
16 very thorough due diligence.

17 And, actually, I would like to
18 point out to the exhibit --

19 Q. Just -- let's just -- if you
20 could just answer my questions.

21 A. I -- I -- we did investigate all
22 aspects of Mr. Egiazaryan's activities, yes.

23 Q. Calling your attention to the
24 next page of the expense report.

25 A. Okay.

1 RINAT R. AKHMETSHIN

2 A. What do you mean "coordinate"?

3 Q. Worked with to develop
4 information or strategy.

5 A. We did do very thorough due
6 diligence.

7 If I might point out to this
8 Document Number 163 --

9 Q. I -- no. I'm asking you who --
10 who else --

11 A. I just like -- sir, I would
12 like -- can I please make my point?

13 Q. I -- I -- I'd like you to answer
14 my question --

15 A. Yes, sir.

16 Q. -- about the name --

17 MR. SPERDUTO: I think this is
18 his answer --

19 THE WITNESS: It's my answer --

20 MR. SPERDUTO: -- let him
21 answer.

22 THE WITNESS: -- so we did
23 this -- we made sure that everything
24 that was said in this project
25 reflected facts, not allegations.

1 RINAT R. AKHMETSHIN

2 So, therefore, we conducted very
3 thorough due diligence.

4 And we interviewed, I think --
5 I, personally, interviewed some
6 people. Mr. Zalmayev went to Russia
7 to talk to countless number of people
8 to establish facts, interviewing
9 people, doing research online,
10 doing -- gathering documents. And
11 there are many people who were
12 interviewed on this matter, yes, sir.

13 BY MR. COHEN:

14 Q. Did you interview
15 Mr. Egiazaryan?

16 A. No. We couldn't get him.

17 Q. Did you -- did you, personally,
18 reach out to him?

19 A. I do not remember that effort,
20 sir.

21 Q. Did you speak with
22 Mr. Egiazaryan's representatives?

23 A. I do not remember, sir. I --

24 Q. Do --

25 A. -- personally, did not.

1 RINAT R. AKHMETSHIN

2 Q. Do you recall, did you,
3 personally, reach out to Mr. Egiazaryan's
4 representatives?

5 A. I did not.

6 Q. Back to my earlier question,
7 were -- you -- other than people whom you
8 interviewed with -- interviewed, was there
9 anyone who you collaborated with to develop
10 a strategy or approach?

11 A. We did talk to people who were a
12 victim of Mr. Egiazaryan's actions, and we
13 did try to find out from them their stories.
14 And we tried to utilize them if -- to the
15 extent they were applicable to our effort.

16 Q. Do you recall who you spoke
17 with?

18 A. On what -- on what matter, sir?

19 Q. Excuse me?

20 A. On what matter, sir?

21 Q. Relating to Mr. Egiazaryan.

22 A. I spoke with many people.

23 Q. Who did you speak to?

24 A. Many people. I do not remember
25 the names. I met with people in Russia. I

1 RINAT R. AKHMETSHIN

2 met with people in Washington, D.C. on these
3 matters.

4 Q. Is there anyone who stands out
5 who you spoke to whose name you can recall?

6 MR. SPERDUTO: Objection to the
7 form; ambiguous; asked and answered.

8 I assume you mean in addition
9 to everybody he's already talked
10 about?

11 BY MR. COHEN:

12 Q. Can you identify the names of
13 individual witnesses who you spoke to?

14 A. Mr. Markarian is probably the
15 most helpful person on this matter.

16 Q. Okay. Anybody else other than
17 Mr. Markarian who comes to mind?

18 A. He introduced us to many people,
19 actually, who were victims of Mr. Egiazaryan.

20 Q. And Mark- -- and Mr. Markarian
21 is an adversary of Mr. Egiazaryan's?

22 A. I think he's -- I think he's a
23 lawyer for a person who was a victim of
24 Mr. Egiazaryan's laundering.

25 Q. And -- and any -- is there

1 RINAT R. AKHMETSHIN

2 anyone else who you can recall speaking
3 with?

4 A. I don't remember. He introduced
5 us to many people, to journalists.

6 Q. Do you recall if you spoke with
7 anyone who either did not have -- who did
8 not have a dispute with Mr. Egiazaryan or
9 did not represent someone who had a dispute
10 with Ms. -- Mr. Egiazaryan?

11 A. I spoke to journalists who were
12 just in general covering this issue.

13 Q. So journalists and -- you spoke
14 with journalists; you spoke with people who
15 are in a dispute or represented people with
16 a dispute with Mr. Egiazaryan.

17 Anybody else?

18 A. That's pretty much people who
19 could be helpful on this project.

20 Q. Did you speak with
21 Suleiman Kerimov?

22 A. No, I did not.

23 Q. Do you know who he is?

24 A. I heard of him. He's a rich man.

25 Q. Did you speak with any

1 RINAT R. AKHMETSHIN

2 was marked, for identification
3 purposes, as Deposition Exhibit
4 Number 169.)

5 - - -

6 THE WITNESS: -69.

7 MR. COHEN: 169.

8 Okay.

9 BY MR. COHEN:

10 Q. Have you seen this document
11 before?

12 A. I might have received this, yes.

13 Q. If you turn to the last page,
14 was this forwarded to you by Jeff Eller of
15 Public Strategies?

16 A. I think it was this
17 Peter Zalmayev message.

18 Q. Well, how did you -- do you see,
19 at the back, there's a -- the address and
20 telephone information?

21 A. Yes, I do see this, a signature
22 file.

23 Q. Excuse me?

24 A. Signature file, yes --

25 Q. Yes.

1 RINAT R. AKHMETSHIN

2 A. -- whereby for Jeff Eller, vice
3 chairman of Public Strategies.

4 Q. And then you forwarded that
5 e-mail to Mr. Zalmayev; is that correct?

6 A. Oh, yes. Yes, that's correct.
7 Okay.

8 Yes, thank you.

9 Yes, I did. He -- he sent it to
10 me, yes, definitely.

11 Q. And you sent it to Mr. Zalmayev
12 on February 6th, 2011; is that correct?

13 A. Correct, yes. It appears so.

14 Q. And that's your e-mail address;
15 is that correct?

16 A. That is correct, yes. So I might
17 have received this article from Mr. Eller and
18 then forwarded it to Mr. Zalmayev, because it
19 was an irrelevant article, I guess.

20 THE COURT REPORTER: I'm sorry.

21 What was the last part?

22 THE WITNESS: Because it was a
23 irrelevant article.

24 BY MR. COHEN:

25 Q. Do you know who Levan Zgenti is?

1 RINAT R. AKHMETSHIN

2 A. Who?

3 Q. Levan, L-E-V-A-N, Z-G-E-N-T-I.

4 A. Levan Zgenti. I don't know the
5 person, but it's a Georgian name.

6 MR. SPERDUTO: I'm sorry. It's
7 what kind of name?

8 MR. LUPKIN: Georgian.

9 MR. SPERDUTO: Thank you.

10 THE WITNESS: Georgian, from
11 Georgia.

12 MR. COHEN: I'll ask the court
13 reporter to mark as Exhibit 170 a
14 document with the
15 Bates Number PZ1080.

16 THE WITNESS: Okay. I know who
17 he is.

18 THE COURT REPORTER: Hold on,
19 sir.

20 - - -

21 (Whereupon, an e-mail string
22 was marked, for identification
23 purposes, as Deposition Exhibit
24 Number 170.)

25 - - -

1 RINAT R. AKHMETSHIN

2 MR. SPERDUTO: You need to wait

3 for a question.

4 (Sotto voce.)

5 THE WITNESS: Okay.

6 Thank you.

7 BY MR. COHEN:

8 Q. Do you see on the -- the bottom

9 e-mail from Levan Zgenti --

10 A. Yes.

11 Q. -- March 23, 2011 to Greg Hitt,

12 Jeff Eller, Rinat Akhmetshin?

13 A. Yes, I do see it.

14 Q. Do you recall receiving this

15 e-mail?

16 A. Yes, I -- and I do know who --

17 it's not -- Levan Zgenti, it's not a person.

18 Q. It's not a person?

19 A. No.

20 Q. What is it?

21 A. It's just an e-mail address.

22 Q. Do you know whose -- whose

23 e-mail address it is?

24 A. It's for a gentleman named

25 Viktor, is --

1 RINAT R. AKHMETSHIN

2 Q. You see Viktor's name is on the
3 bottom; is that correct?

4 A. Yes, yes. And I met him,
5 actually.

6 Q. Who is Viktor?

7 A. He's their local counsel in
8 Moscow -- not counsel, but he's someone who
9 works with them.

10 Q. Works with Public Strategies?

11 A. With -- with Greg Hitt, yes,
12 Public Strategies.

13 Q. How did you first come to learn
14 that Greg Hitt was representing an alleged
15 victim of Kerimov?

16 A. Because it's -- I think it came
17 the other way around. I met Viktor in
18 Moscow, and he referred me to Greg Hitt, he
19 or his colleagues. I don't remember.

20 Q. And it says Dear colleagues and
21 is addressed to you.

22 A. Well, it's -- I -- I'm not a
23 colleague since I haven't been paid from him.

24 Q. You -- you -- you were working
25 together in some capacity with Mr. Hitt and

1 RINAT R. AKHMETSHIN

2 Mr. Eller; is that correct?

3 A. No, that's not correct, sir.

4 Q. You both have an interest in --
5 with Ashot Egiazaryan; is that correct?

6 A. I -- I would say yes, we -- we're
7 both interested in -- or we were interested
8 in Ashot Egiazaryan matter. That is an
9 accurate statement.

10 Q. And you're sharing information
11 among each other between you and Public
12 Strategies; is that correct?

13 A. Yes, I -- I -- I think Peter
14 shared some information with them, and I got
15 some information from them as well, just
16 discussed these things with them. And their
17 person was foreign media in Russia.

18 MR. COHEN: I'll ask the court
19 reporter to mark as Exhibit 171 an
20 e-mail dated March 24, bearing Bates
21 Number PZ1082.

22 - - -

23 (Whereupon, an e-mail was
24 marked, for identification purposes, as
25 Deposition Exhibit Number 171.)

1 RINAT R. AKHMETSHIN

2 - - -

3 BY MR. COHEN:

4 Q. It's an e-mail from
5 Rinat Akhmetshin to Peter Zalmayev.

6 As you'll see, at the bottom --

7 THE COURT REPORTER: Hold on a
8 second. He doesn't have it yet.

9 Wait, wait, wait, wait.

10 THE WITNESS: Thanks so much.

11 Yes, sir.

12 BY MR. COHEN:

13 Q. This is -- you're also
14 forwarding information received from
15 Greg Hitt on this occasion; is that correct?

16 A. Correct, yes.

17 MR. COHEN: And I will ask the
18 court reporter to mark as Exhibit 172
19 an e-mail bearing Bates Number PZ2855
20 from Rinat Akhmetshin to
21 Peter Zalmayev.

22 - - -

23 (Whereupon, an e-mail was
24 marked, for identification purposes, as
25 Deposition Exhibit Number 172.)

1 RINAT R. AKHMETSHIN

2 - - -

3 BY MR. COHEN:

4 Q. Have you seen this --

5 THE COURT REPORTER: Wait.

6 BY MR. COHEN:

7 Q. -- e-mail before?

8 MR. COHEN: I'm sorry.

9 THE COURT REPORTER: No, he
10 hasn't.

11 THE WITNESS: Not formally, I
12 guess.

13 THE COURT REPORTER: Here you
14 go.

15 THE WITNESS: I'll say that
16 I've seen this, yes.

17 BY MR. COHEN:

18 Q. What -- what is the content of
19 this e-mail?

20 A. It's written in Russian. So it
21 says, Rinat, hello. I'm sending two memos
22 about -- I mean, ironically, just heroic
23 actions --

24 Q. Well, let me -- let me just ask
25 you a different question.

1 RINAT R. AKHMETSHIN

2 A. Yes.

3 Q. Does it say in this e-mail that
4 to -- when transcribed the stories, to
5 forward them along with --

6 A. Greg and Jeff.

7 Q. -- links of photos to Greg and
8 Jeff?

9 A. Correct, yes.

10 Q. And that Greg and Jeff is Greg
11 and Jeff of Public Strategies; is that
12 correct?

13 A. That is correct, yes.

14 Q. This document was sent on or
15 around March 15th, 2011 at 6:35 p.m.; is
16 that correct?

17 A. That's what the date says.

18 Q. And it was sent from -- from you
19 to Peter Zalmayev?

20 A. Correct, yes.

21 Q. I'm going to start asking some
22 questions about the confidential Public
23 Strategies documents.

24 MR. SPERDUTO: Okay. Is now a
25 convenient time for a break? I need

1 RINAT R. AKHMETSHIN

2 a very short break.

3 MR. COHEN: Sure, absolutely.

4 MR. SPERDUTO: Be right back.

5 THE VIDEOGRAPHER: The time is

6 2:56. We're going off the record.

7 This is the end of Disc Number 2,

8 going on to Disc Number 3.

9 (Whereupon, a brief recess was
10 taken from 2:56 p.m. to 3:06 p.m.)

11 THE VIDEOGRAPHER: The time is
12 3:06 p.m. This is the beginning of
13 Disc Number 3 in the deposition of
14 Rinat Akhmetshin.

15 BY MR. COHEN:

16 Q. Just going back to Exhibit 170
17 for a second.

18 A. Yes, sir.

19 Q. And that's the one that has the
20 Dear colleagues?

21 A. Yes.

22 Q. And -- and you said that you
23 don't consider yourself colleagues with the
24 Public Strategies people; is that correct?

25 A. I did not -- I do not --

1 RINAT R. AKHMETSHIN

2 Q. And that's not --

3 A. -- consider myself a colleague.

4 Q. -- a phrase that you would

5 use --

6 A. Definitely not.

7 Q. -- strike that.

8 That's not a phrase that you
9 would use to describe your relationship with
10 them?

11 A. Oh, definitely not.

12 Q. And -- and you wouldn't refer to
13 Mr. Hitt or Mr. Eller or Mr. Laurence as a
14 colleague; is that correct?

15 A. I definitely would not.

16 Q. By the way, who's -- who's --
17 there's an A. Laurence.

18 A. I have no idea --

19 Q. Do you know who --

20 A. -- I never met him --

21 Q. -- do you know who Hilland --
22 Hilland Knowlton is?

23 A. -- I know the firm, actually. I
24 employed them years ago.

25 Q. Do you know them as relating to

1 RINAT R. AKHMETSHIN

2 any Ashot Egiazaryan issue?

3 A. I'm not aware of it, but I know
4 the firm -- I heard the name -- I know the
5 firm, actually. I used to know people there
6 before.

7 Q. Do you know who Andrew Laurence
8 is?

9 A. Never, never met him.

10 MR. COHEN: Ask the court
11 reporter to mark as Exhibit 173 an
12 e-mail from Rinat Akhmetshin to
13 Levan Zgenti, who is not a person.

14 Yeah, we have lots of copies.

15 - - -

16 (Whereupon, an e-mail was
17 marked, for identification purposes, as
18 Deposition Exhibit Number 173.)

19 - - -

20 MR. SPERDUTO: Oh, thank you.

21 MR. COHEN: And we'll get
22 another one.

23 BY MR. COHEN:

24 Q. Okay. Do you know who
25 Paul Butler is?

1 RINAT R. AKHMETSHIN

2 A. He's a lawyer there.

3 Q. He's a lawyer for who?

4 A. For -- I don't know. He's a
5 lawyer at Akin Gump. He works for one of
6 those interests which were hit by
7 Mr. Egiazaryan.

8 Q. He's a lawyer for
9 Suleiman Kerimov-related interests; is that
10 correct?

11 A. I -- I think so, yes.

12 Q. Is that something --

13 A. He's a lawyer for the firm, I
14 think, for the company which is -- some way
15 there.

16 Q. And this is an e-mail from you
17 to Levan Zgenti --

18 A. Um-hum.

19 Q. -- is that correct?

20 A. Yes.

21 Q. And -- and that's Russian -- is
22 that -- is that a company or --

23 A. It's -- it's just a name, I
24 think. It's not the name of the person;
25 it's, like -- the name of the person is

1 RINAT R. AKHMETSHIN

2 Viktor.

3 Q. It's just an e-mail address?

4 A. It's an e-mail address, yes --

5 Q. Okay.

6 A. -- the name of the person is

7 Viktor.

8 Q. And -- and what is the subject
9 of this e-mail?

10 A. Let me just read it.

11 MR. SPERDUTO: You should use
12 this.

13 THE WITNESS: Um-hum.

14 (Whereupon, the witness reviews
15 the document.)

16 BY MR. COHEN:

17 Q. You copied Jeff Eller on this as
18 well, right?

19 A. Correct, yes.

20 Q. And Greg Hitt?

21 A. Correct.

22 Q. And Paul Butler, who we just
23 discussed; is that correct?

24 A. They were -- correct, yes.

25 Q. And you refer to all of those

1 RINAT R. AKHMETSHIN

2 individuals as colleagues; is that correct?

3 A. Yes, an unfortunate turn of
4 phrase.

5 Q. At that point, you felt that
6 they were colleagues?

7 A. I did not feel that way, but I
8 think that since this was -- was it before or
9 after this other colleague matter? Maybe
10 it's something in this spirit.

11 But they were never my
12 colleagues, sir, for the record.

13 Q. This e-mail is before the e-mail
14 from Viktor referring to you as a colleague;
15 is that correct? If I can ask you to
16 compare --

17 A. Is this 15 --

18 Q. -- Exhibit 170 with 173.

19 A. One second.

20 March 23rd. February 25th.

21 Yes, it appears that way, sir.

22 Q. Why were you passing along this
23 information to the -- these individuals and
24 entities who work for Suleiman Kerimov?

25 A. Just to make them aware, because

1 RINAT R. AKHMETSHIN

2 they shared some information with us, and I
3 shared with them our strategy. And this is
4 exactly the strategy which we employed, as
5 you could see further down the line. It was
6 an exchange of information.

7 Q. You were coordinating on --
8 in -- with -- with these individuals --

9 A. Yeah, I think I --

10 Q. -- and developing information
11 regarding Ashot Egiazaryan --

12 A. -- I think I --

13 Q. -- is that correct?

14 A. -- I think I informed them on our
15 strategies.

16 Q. Did you consult with them on
17 your strategies?

18 A. No. I don't think they're people
19 who could be helpful in this situation.

20 Q. Did you ever seek the input of
21 Public Strategies or other representatives
22 of Suleiman Kerimov on your strategy?

23 MR. SPERDUTO: Objection to
24 form, "other representatives."

25 THE WITNESS: Do I have to

1 RINAT R. AKHMETSHIN

2 answer?

3 MR. SPERDUTO: Pardon me?

4 THE WITNESS: Do I have to
5 answer this?

6 MR. SPERDUTO: You get to
7 answer.

8 THE WITNESS: Oh, I get to
9 answer. Okay.

10 Yes, I -- I ran it by them.
11 You know, it's always good to run
12 certain things by people. You know,
13 they might advise something.

14 BY MR. COHEN:

15 Q. I'm going to show you a document
16 we're going to have marked as Exhibit 174.

17 - - -

18 (Whereupon, an e-mail was
19 marked, for identification purposes, as
20 Deposition Exhibit Number 174.)

21 - - -

22 THE WITNESS: Thank you.

23 BY MR. COHEN:

24 Q. This is another e-mail from you
25 to Greg Hitt, Paul Butler and Jeff Eller; is

1 RINAT R. AKHMETSHIN

2 that correct?

3 A. Yes.

4 Q. It was sent by you on March 21;

5 is that correct?

6 A. It does appears that way, sir.

7 Q. And it says that -- and it says

8 let's discuss; is that correct?

9 A. Yes, it says.

10 Q. Do you have regular

11 communications and discussions with

12 Mr. Hitt, Mr. Butler or Mr. Eller?

13 A. I think I just -- my discussion

14 with Mr. Hitt, you know, or other people just

15 kind of were in the -- just in the loop, I

16 guess.

17 Q. Was Mr. Hitt your main contact

18 at Public Strategies?

19 A. It was the only person in

20 Washington whom I talk about these matters,

21 yes.

22 Q. It says that the Russian

23 Government is placing him on a Red Notice

24 shortly?

25 A. Yes.

1 RINAT R. AKHMETSHIN

2 Q. I assume you're referring to

3 Mr. Egiazaryan; is that correct?

4 A. I think so, yes.

5 Q. And -- and how did you come to

6 learn what the Russian Government would be

7 doing?

8 A. Mr. Markarian informed me about

9 it.

10 Q. What did he tell you?

11 A. He said that, you know, just

12 there's a Red Notice alert, I think, already

13 out. It's in connection to his client's

14 matter.

15 Q. Did he say how he came to learn

16 that a Red Notice would be coming out

17 shortly?

18 A. I think it was in connection --

19 direct connection to his client, so he was

20 aware of it, yes.

21 Q. Did he say how he came to be

22 aware of it?

23 A. I do not remember him saying

24 that.

25 MR. SPERDUTO: I just -- all

1 RINAT R. AKHMETSHIN
2 these things say Confidential. The
3 extra copies I'm handing back to you
4 so you can deal with the protective
5 order. I'm just going to keep one
6 set.
7 MR. COHEN: Okay, that's fine.
8 MR. SPERDUTO: Thank you for
9 the extra one.
10 MR. COHEN: Just --
11 MR. SPERDUTO: Okay.
12 MR. COHEN: -- leave them in a
13 pile and we'll --
14 MR. SPERDUTO: Yes, sir.
15 MR. COHEN: -- I'll ask the
16 court reporter to --
17 MR. SPERDUTO: Is this one or
18 is this several?
19 MR. COHEN: That's -- that's
20 several of the same.
21 MR. SPERDUTO: Okay.
22 MR. COHEN: So you can
23 circulate those.
24 MR. SPERDUTO: I'm sorry.
25 MR. COHEN: -- the court

1 RINAT R. AKHMETSHIN

2 reporter to mark this document,

3 PSI2107, as Exhibit 175.

4 - - -

5 (Whereupon, an e-mail string

6 was marked, for identification

7 purposes, as Deposition Exhibit

8 Number 175.)

9 - - -

10 THE WITNESS: Thank you.

11 BY MR. COHEN:

12 Q. Is this e-mail -- an e-mail from
13 you?

14 A. It does appear that way, sir.

15 Q. And is this an e-mail from you
16 on April 13th, 2011?

17 A. That's what it says.

18 Q. Is it to Sarah Hale?

19 A. I think so, yes.

20 Q. Do you know who Sarah Hale is?

21 A. I think she's one of the lawyers
22 for that matter, for a matter of Kerimov,
23 yes.

24 Q. Do you know what Denoro
25 Industries is?

1 RINAT R. AKHMETSHIN

2 A. That's the company which I think
3 that had the dispute with Mr. Egiazaryan.

4 Q. And that's a -- that's a
5 Suleiman Kerimov company, correct?

6 A. I think so, yes. I believe so,
7 yes.

8 Q. Do you know who the
9 Gadzhiev Nariman is?

10 A. It's someone who works in Moscow
11 for this Denoro company.

12 Q. I'm sorry. Works for who?

13 A. For this Denoro company.

14 Q. And why are you sending him
15 e-mails or copying him on e-mails?

16 A. Because he approached me on this
17 matter of story investigation, and I said
18 that I would do this -- I will talk to the
19 airport about it.

20 MR. LUPKIN: Can you speak up
21 just a little bit? I'm having --

22 THE WITNESS: Sure, no problem.

23 MR. LUPKIN: Thanks.

24 THE WITNESS: So I -- I think
25 that he -- I met him in Moscow for

1 RINAT R. AKHMETSHIN

2 Mr. Markarian, and they -- he asked
3 me to help them on one issue.

4 BY MR. COHEN:

5 Q. What was that issue?

6 A. It was an issue of the inquiry
7 from the reporter whom I know.

8 Q. What -- what reporter and what
9 inquiry?

10 A. It was a reporter from Radio Free
11 Europe. It was an inquiry about something
12 about Mr. Kerimov and Mr. Egiazaryan.

13 Q. And -- and who is the one who
14 approached you to assist them in responding
15 to a press inquiry?

16 A. I think Mr. Nariman asked me to
17 help.

18 Q. Did you know him to be a -- a
19 relative of Mr. Kerimov?

20 A. I'm not sure. I know he works
21 for him.

22 Q. Were you paid to assist?

23 A. I did not.

24 Q. Why not?

25 A. Because it's very easy. I met

1 RINAT R. AKHMETSHIN

2 the guy and talked to him, but --

3 Q. So you --

4 A. -- it wasn't --

5 Q. -- were doing this --

6 A. -- it wasn't difficult for me.

7 Q. -- you were doing this as a
8 favor?

9 A. I did this as a favor, yes.

10 Q. You did this because you were
11 sharing information back and forth between
12 Public Strategies and -- you and
13 Peter Zalmayev; is that correct?

14 A. We did share information, and
15 I -- I thought it was in a good faith to help
16 these people, because they were treated
17 unfairly by that story.

18 MR. GOLDEN: It's not the
19 music; it's a conference call.

20 BY MR. COHEN:

21 Q. Do you know who J. Martin is at
22 pstrategies.com?

23 A. J. Martin? No, I don't think --
24 I don't remember meeting him.

25 Q. Do you know who Jim Langdon is?

1 RINAT R. AKHMETSHIN

2 A. I do not know, sir.

3 Q. You knew enough to include them
4 as cc's?

5 A. I think it was this -- something
6 which I replied to something.

7 Q. Well, the e-mail below is also
8 an e-mail from you; is that correct?

9 A. Yes. Yes, it appears that way.

10 MR. SPERDUTO: Jason, can I
11 just ask you a question? I mean,
12 honestly, this document has been
13 redacted. I don't know who redacted
14 it or why.

15 But do you know whether this
16 document is a stand-alone or if this
17 string of e-mails goes further than
18 the two we see from Rinat?

19 MR. COHEN: This is all we
20 have. I don't know anything further.

21 MR. SPERDUTO: I mean, does
22 2108 look like it's the same string
23 in terms of Bates numbers?

24 MR. COHEN: I don't know
25 offhand.

1 RINAT R. AKHMETSHIN

2 MR. SPERDUTO: Okay.

3 MR. COHEN: If it was, we would
4 have included it together.

5 I'll ask the court reporter to
6 mark as Exhibit 176 a document with
7 the Bates Number PSI2102.

8 - - -

9 (Whereupon, an e-mail string
10 was marked, for identification
11 purposes, as Deposition Exhibit
12 Number 176.)

13 - - -

14 THE WITNESS: I find it
15 mysterious.

16 MR. SPERDUTO: Redact
17 everything except you.

18 MR. COHEN: 176.

19 BY MR. COHEN:

20 Q. Have you seen Exhibit 176
21 before?

22 A. It looks like an e-mail from me,
23 sir.

24 Q. Is it an e-mail from you to
25 Jeff Eller?

1 RINAT R. AKHMETSHIN

2 A. Correct, yes.

3 Q. On February 4th, 2011?

4 A. Correct, sir.

5 Q. And it's refer -- refresh --

6 referencing an AP inquiry?

7 A. Yes.

8 Q. Do you know what AP inquiry

9 that's referring to?

10 A. It was a -- I would assume it's

11 Associated President inquiry.

12 Q. Excuse me?

13 A. AP, Assoc- -- Associated Press.

14 Q. Yes.

15 Do you know who -- who -- what

16 the inquiry was?

17 A. I think it was something about

18 the Egiazaryan matter.

19 Q. Do you recall any inquiries from

20 Doug Birch?

21 A. Not to me, personally. I know

22 Peter talked to him.

23 Q. And the e-mail towards the

24 bottom includes a cc to Eliot Lauer?

25 A. Yes.

1 RINAT R. AKHMETSHIN

2 Q. Do you know who Eliot Lauer is?

3 A. I think he's one of the lawyers.

4 Q. For Denovo -- Denoro, I mean?

5 A. The -- the -- for the same

6 people, actually --

7 Q. For -- for Kerimov's company --

8 A. -- for -- yes --

9 Q. -- is that correct?

10 A. -- Kerimov company, I think so,
11 yes.

12 Q. Is this another e-mail where
13 you're providing some assistance to the
14 Denoro people?

15 A. It's not assistance, rather, but,
16 you know, if -- if I could refer to message
17 from April 13, Drop SK angle, and -- and the
18 story, really, is about an asylum matter in
19 the United States. So, therefore, my focus
20 was on this asylum matter, which was paid by
21 my client.

22 And I really, to be honest, did
23 not want all those people running around and
24 trying -- trying to put all these stories
25 about murky business deals which I really

1 RINAT R. AKHMETSHIN

2 have no idea about and something which would
3 have really muddled up the issue which I was
4 working on.

5 So it was just the angle of my
6 story always was the asylum matter in the
7 United States for Mr. Egiazaryan.

8 And these -- I view these people
9 as people who are trying to dilute our punch
10 by having these stories about business
11 disputes. And this is such a murky matter,
12 no one wants to take sides on these matters.
13 You know, just business deals went wrong and
14 then they're, like, 20 law firms involved in
15 this thing.

16 And here, this Mr. Egiazaryan
17 matter, as far as I'm concerned, is about
18 being -- providing support for message of
19 hatred in Russia and why -- and should a
20 person like that be admitted to the
21 United States.

22 So, therefore, all these
23 communication with these people, which did
24 not last for much longer, was trying to
25 dissuade them from muddying up my matter.

1 RINAT R. AKHMETSHIN

2 Q. And -- and you're trying to
3 persuade them to focus on the asylum matter?

4 A. To the effect which -- to the
5 extent which they could have focused on this
6 thing. I wish they did, but they -- they had
7 their own interests.

8 Q. And -- and have you seen -- you
9 mentioned to a message of hatred in Russia?

10 A. I have seen message of hatred
11 being propagated by LDPR.

12 Q. Have you seen Mr. Egiazaryan
13 making any personal statements that reflect
14 the message of hatred?

15 A. I have seen Mr. Egiazaryan being
16 an associate of this party and --

17 Q. Have you seen --

18 A. -- serving on their --

19 Q. -- okay. I'll ask you the
20 question again.

21 Have you seen Mr. Egiazaryan --
22 any statements from Mr. Egiazaryan expressing
23 hatred for anyone?

24 A. I haven't seen many statements
25 with Mr. Egiazaryan because I do not believe

1 RINAT R. AKHMETSHIN

2 he was a politician, per se. But he was a
3 supporter. That's why I very carefully said
4 about support of this message, because he
5 lended his name to that message.

6 Q. Did you ever see him -- any
7 statements from him -- any anti-Semitic
8 statements from Mr. Egiazaryan?

9 A. I don't have seen any statements
10 from Mr. Egiazaryan, except for him being a
11 member -- or an associate of that party.

12 Q. Have you seen any statements
13 from him supporting any positions of the
14 LDPR?

15 A. No, but by his -- I saw him
16 supporting LDPR by lending them their name --
17 his own personal name, which is -- I think
18 it's quite significant, in my view.

19 Q. Did you see any -- any
20 position -- any statement by Mr. Egiazaryan
21 in favor of any position of the LDPR that
22 you find reprehensible or inappropriate?

23 A. I think him being serving on the
24 list of that party within Russian Duma,
25 whereas he could have joined any of the

1 RINAT R. AKHMETSHIN

2 parties. There's a Communist party; there's
3 the Fair Russia party; there's -- there's
4 several parties.

5 He chose year after year for
6 nearly 10 years to -- to be associate -- if
7 you associate with Hamas, it's the same way.
8 You know, they -- they want to destroy
9 Israel. And anything that's having to do
10 with Hamas is deplorable. It just -- just --
11 in the same way, that's how I feel about this
12 matter, sir.

13 Q. Do you understand that
14 Mr. Egiazaryan was an independent and not a
15 member of the LDPR?

16 A. He served --

17 MR. SPERDUTO: Objection to the
18 form.

19 THE WITNESS: -- I -- sir, as
20 far as I'm concerned, he was a
21 supporter of that party by lending
22 them his name.

23 BY MR. COHEN:

24 Q. But going back to the previous
25 question you didn't answer, you've not seen

1 RINAT R. AKHMETSHIN

2 any statements by him supporting any
3 position of the LDPR --

4 A. Not until now --

5 Q. -- that you think is
6 inappropriate?

7 A. -- not until now -- I'm not aware
8 by now whether he made any -- any statements,
9 per se, actually --

10 Q. You've re- --

11 A. -- statements by him.

12 Q. -- you've researched the matter
13 thoroughly; is that correct?

14 A. I think so, yes.

15 Q. And -- and by -- in your efforts
16 with -- in providing support to Public
17 Strategies, you were also assisting
18 Suleiman Kerimov; is that correct?

19 MR. SPERDUTO: Objection to the
20 form; assumes facts; mischaracterizes
21 testimony.

22 Go ahead.

23 THE WITNESS: I don't think it
24 was Mr. Kerimov. When I -- I
25 remember my first meeting with Public

1 RINAT R. AKHMETSHIN

2 Strategies, and the very first thing
3 I told them what my stand on this
4 issue is. I said that I'm a
5 representative of Mr. Vavilov.

6 And I have -- I told
7 Mr. Vavilov's story in connection to
8 their adversary. And, you know, in a
9 way, there's a Russia saying,
10 adversary of my adversary is my
11 friend. So that's -- that's, I
12 think, best describe my attitude
13 towards these people.

14 BY MR. COHEN:

15 Q. And so your attitude towards the
16 Kerimov people who you were communicating
17 with on a regular basis was they were your
18 friend?

19 A. I -- I view them as a friendly
20 force.

21 Q. And -- and you understood, by
22 providing information and advice, that you
23 were assisting them in some way or hoping
24 to?

25 MR. SPERDUTO: Objection to the

1 RINAT R. AKHMETSHIN

2 form.

3 Go ahead.

4 THE WITNESS: The same way as I
5 assisted Mr. Smagan, like the same
6 way I assisted some other people. So
7 we were trying to kind of share these
8 notes with people who have interest
9 in this issue.

10 BY MR. COHEN:

11 Q. You had the same -- you had the
12 same interests?

13 MR. SPERDUTO: Objection to the
14 form --

15 THE WITNESS: This person --

16 MR. SPERDUTO: --
17 mischaracterizes prior testimony.

18 Sorry.

19 THE WITNESS: -- as --

20 MR. SPERDUTO: Ambiguous.

21 Go ahead now.

22 THE WITNESS: -- say same --
23 we -- we -- we -- we are interested
24 in the same person. That's the
25 extent at which we kind of joined.

1 RINAT R. AKHMETSHIN

2 But our interests were quite
3 opposite as which, in this case, of
4 them trying to tell their story,
5 which would have undercut my story.

6 BY MR. COHEN:

7 Q. And -- and you felt that by
8 providing them with some information, they
9 might be able to tell a more effective
10 story?

11 A. I thought maybe they could
12 amplify our story, but they had no interest
13 in doing that.

14 Q. And you felt if they amplified
15 your story, that would be helpful for you?

16 A. That would have been helpful for
17 my client.

18 Q. And it would have been helpful
19 for Mr. Kerimov?

20 A. I don't think so.

21 Q. And you com- -- as we've seen,
22 you were regularly communicating with
23 Mr. Kerimov's colleagues; is that correct?

24 MR. SPERDUTO: Objection;
25 characterization.

1 RINAT R. AKHMETSHIN

2 But go ahead.

3 THE WITNESS: I would not
4 describe it "regularly," but I -- I
5 have exchanged quite a few e-mails.
6 I would say probably 10, 20, at most.
7 It might be less than that. I don't
8 know how many you have.

9 BY MR. COHEN:

10 Q. And did you -- and you knew that
11 Mr. Kerimov was a member of the LDPR; is
12 that correct?

13 MR. SPERDUTO: I'm sorry. I
14 didn't hear the beginning.

15 BY MR. COHEN:

16 Q. Did you know that Mr. Kerimov
17 was a member of the LDPR?

18 A. I did know, and I know that he
19 left that party in disgust.

20 Q. And -- and you, nonetheless,
21 continued to provide support for Mr. Kerimov
22 and Kerimov's position, notwithstanding the
23 fact that he was a member of the LDPR?

24 A. I think he publicly left that
25 party. He disassociated himself from that

1 RINAT R. AKHMETSHIN

2 message.

3 Good enough for me.

4 Q. But he was not -- he was a
5 member for a period of time; is that
6 correct?

7 A. I believe so, yes.

8 Q. You know so; is that correct?

9 A. I think so, yes. I established
10 that.

11 MR. COHEN: Mark as
12 Exhibit 176 --

13 THE WITNESS: 177.

14 MR. COHEN: -- 177 an e-mail
15 dated February 5th, bearing
16 Bates Number PSI2227.

17 THE WITNESS: Thank you.

18 MR. COHEN: Let me keep one for
19 the court reporter.

20 MR. SPERDUTO: Sorry.

21 - - -

22 (Whereupon, an e-mail string
23 was marked, for identification
24 purposes, as Deposition Exhibit
25 Number 177.)

1 RINAT R. AKHMETSHIN

2 - - -

3 THE WITNESS: Thanks.

4 BY MR. COHEN:

5 Q. Have you seen this e-mail
6 before?

7 A. Yes, I do -- I did. I think so.

8 Q. It's an e-mail from you to
9 various people who work for Suleiman Kerimov
10 or his companies?

11 A. Correct. I'm writing this was --
12 yes.

13 Q. You sent this e-mail on or about
14 February 5th, 2011; is that correct?

15 A. That's what it says, sir.

16 Q. And you're updating them on the
17 status of -- of an Associated Press piece;
18 is that correct?

19 A. I think this was in follow up
20 with the previous e-mail, yes.

21 Q. And you're describing an effort
22 to insert an alternative narrative into the
23 story; is that correct?

24 A. Correct. I wanted to have a
25 rounded story, not a one-way -- not a

1 RINAT R. AKHMETSHIN

2 one-sided story.

3 Q. And did the Kerimov people
4 support your efforts to do this?

5 A. I think they were the ones who --
6 they're the ones who alerted me to this
7 story --

8 Q. They alerted you to --

9 A. -- the stories coming -- excuse
10 me?

11 Q. Who -- who alerted you that the
12 AP was writing this story about
13 Ashot Egiazaryan?

14 A. I think it might have been
15 Jeff Eller --

16 Q. Jeff Eller?

17 A. -- so he -- Jeff Eller, yes --
18 issued this AP inquiry. So this was, like,
19 leading up to this thing.

20 Q. Why did Jeff Eller alert you to
21 the A -- the inquiry from AP?

22 A. Because he wanted to let me know
23 that there's a story coming out and give me
24 an opportunity to insert my story in this.

25 Q. Did you share your conversation

1 RINAT R. AKHMETSHIN

2 with Mr. -- that you had with Mr. Eller with
3 Mr. Zalmayev?

4 A. I might have, yes, because I ask
5 him to approach AP correspondent trying to
6 provide additional information on the
7 story --

8 Q. And --

9 A. -- yes.

10 Q. -- and the reference to the
11 friendly human rights NGO person from
12 New York in the second line is Mr. Zalmayev;
13 is that correct?

14 A. Yes, I think so, yes.

15 Q. Do you recall that he met
16 Mr. Birch in D.C.?

17 A. I -- if I remember correctly,
18 yes, sir.

19 Q. Do you recall if Mr. Zalmayev
20 met with Mr. Birch before the story came
21 out -- his first AP story came out?

22 A. I think that was the purpose to
23 meet Mr. Birch.

24 MR. COHEN: I'll ask the court
25 reporter to mark as Exhibit 178 a

1 RINAT R. AKHMETSHIN

2 copy of an e-mail from

3 Rinat Akhmetshin to Greg Hitt bearing

4 Bates Number PSI2084.

5 - - -

6 (Whereupon, an e-mail was

7 marked, for identification purposes, as

8 Deposition Exhibit Number 178.)

9 - - -

10 THE WITNESS: Thank you.

11 BY MR. COHEN:

12 Q. Have you seen this e-mail

13 before?

14 A. Yes, I have, sir.

15 Q. Did you send this e-mail to

16 Mr. Hitt on or around February 25th, 2011?

17 A. That's what it says.

18 Q. Does this contain a draft

19 of an -- of an article?

20 A. Correct. That's the director of

21 the op-ed.

22 Q. Why were you sharing with

23 Mr. Hitt drafts of an -- of an article that

24 you were hoping to place?

25 A. I hoped maybe he could help me

1 RINAT R. AKHMETSHIN

2 with this.

3 Q. Did he help you with it?

4 A. No.

5 Q. Did he provide comments or edits
6 to it?

7 A. No.

8 Q. How do -- how do you -- why do
9 you recall that?

10 A. I -- I think I talked to him
11 about that, and he said that, really, he had
12 no ability to help me.

13 Q. Did he help you place the
14 article?

15 A. No, he didn't.

16 Q. Who placed the article?

17 A. I'm not sure whether the -- has
18 it ever run?

19 THE COURT REPORTER: I'm sorry?

20 THE WITNESS: Yeah. I -- I'm
21 not sure whether this article has
22 ever run. So we were shopping it.

23 I thought maybe he could --

24 BY MR. COHEN:

25 Q. Do --

1 RINAT R. AKHMETSHIN

2 A. -- help --

3 Q. -- do --

4 A. -- me to find the place for it.

5 Q. -- do you know who drafted this
6 article in the first place?

7 A. It could be Peter Zalmayev,
8 Mr. Zalmayev.

9 Q. I'm sorry. I didn't catch the
10 answer.

11 A. It could have been Mr. Zalmayev.

12 Q. Do you know whether or not it
13 was Mr. Zalmayev?

14 A. I do not remember, sir. Probably
15 Mr. Zalmayev.

16 Did it ever run?

17 Q. I'll show you in a second.

18 A. Sure.

19 MR. COHEN: I'll ask the court
20 reporter to mark as Exhibit 179 a
21 e-mail from Rinat Akhmetshin bearing
22 Bates Number PSI2030.

23 - - -

24 (Whereupon, an e-mail string
25 was marked, for identification

1 RINAT R. AKHMETSHIN

2 purposes, as Deposition Exhibit

3 Number 179.)

4 - - -

5 THE WITNESS: Thank you.

6 BY MR. COHEN:

7 Q. Have you -- have you seen this
8 e-mail before?

9 A. Yes, I have.

10 Q. Did you send this e-mail to
11 someone at Public Strategies on or around
12 March 13th, 2011?

13 A. Probably, yes.

14 Q. And you sent this to -- it
15 doesn't have a To on it; is that correct?
16 An addressee?

17 A. I don't see it, yes, sir.

18 Q. You sent this to a group of --
19 did you send this to a group of people?

20 A. I don't remember, sir. It looks
21 weird, because you always have bcc at least
22 if you send to the group.

23 Q. I'm sorry. I couldn't hear you.

24 A. Yeah. If you send to the group,
25 it will appear a bcc tag, but it -- there's

1 RINAT R. AKHMETSHIN

2 nothing here.

3 Q. And at the end of the first
4 paragraph, it says ra, right, on the first
5 page?

6 A. Sir.

7 Q. At the end of the first
8 paragraph, it says --

9 A. Uh-huh --

10 Q. -- louder than --

11 A. -- all right --

12 Q. -- 1000 words --

13 A. -- that's me, yes.

14 Q. Yeah.

15 A. Yes, the picture -- there's a
16 wonderful cartoon, yes.

17 Q. And do you recall sending this
18 to Public Strategies?

19 A. I might've sent it to them, yes.

20 Q. And this is an article that
21 stated that it's authored by
22 Leonid Komarovsky; is that correct?

23 A. Yes, it does say so.

24 Is that the same one?

25 MR. COHEN: I'll ask the court

1 RINAT R. AKHMETSHIN

2 reporter to mark as Exhibit 180 an
3 e-mail bearing Bates Number PSI2035.

4 - - -

5 (Whereupon, an e-mail was
6 marked, for identification purposes, as
7 Deposition Exhibit Number 180.)

8 - - -

9 BY MR. COHEN:

10 Q. Have you seen this before?

11 A. Yes, it looks like I sent it.

12 Q. And you sent this to

13 Mr. Nariman; is that correct?

14 A. Correct, yes.

15 Q. He's who you previously
16 described as someone who works for Kerimov's
17 company?

18 A. I know that there's a
19 company Denoro, yes.

20 THE COURT REPORTER: It's a
21 company what?

22 THE WITNESS: It's a company
23 called Denoro or something like that.

24 BY MR. COHEN:

25 Q. And is he reporting on various

1 RINAT R. AKHMETSHIN

2 exchange of information has stopped by the
3 time when we realized that, you know, just
4 there's nothing else to discuss or compare.

5 Q. Your issue -- was your issue to
6 have Mr. Egiazaryan deported?

7 A. No. My issue, as my client asked
8 me to do, to not -- to allow my client not to
9 see Mr. Egiazaryan in the United States. I
10 will put it that way.

11 Q. Did you participate in the
12 securing of letters from Lev Ponomarev and
13 Lyudmila Alexeyeva?

14 A. I did not. I do not know.

15 Q. Did you play any role in the
16 drafting of those letters?

17 A. I might have seen some -- I'm not
18 sure, sir. No, I --

19 Q. Did you --

20 A. -- the answer probably is no. I
21 do not remember.

22 Q. You don't remember or you did
23 not?

24 A. I do not remember, sir.

25 Q. Did you play a role in drafting

1 RINAT R. AKHMETSHIN

2 THE WITNESS: Thank you.

3 BY MR. COHEN:

4 Q. Is this an e-mail from you to
5 Mr. Zalmayev -- I'm sorry -- from
6 Mr. Zalmayev to you?

7 A. It does appear that way, sir,
8 yes.

9 Q. And it's dated February 9th,
10 2011?

11 A. Correct.

12 Q. You received this e-mail on
13 around February 9th, 2011?

14 A. That's what it states, yes.

15 Q. And I'll call your attention to
16 the bottom.

17 And it says, the Chechnya thing
18 event -- evidently backfired on us --

19 A. Correct.

20 Q. -- do you see that?

21 A. Yes, I see that, sir.

22 Q. What did you understand
23 Mr. Zalmayev to mean by that?

24 A. I do not know, sir. I think that
25 he probably refers to the fact that, you

1 RINAT R. AKHMETSHIN

2 know, there's research on Chechen matter. We
3 couldn't find any credible information.

4 And I think that was the time
5 when discussion of Mr. Egiazaryan's Chechen
6 record was suspended, because we couldn't say
7 with certainty about his Chechen activity.
8 We're very careful to say only facts.

9 Q. And -- and the information
10 regarding what happened in Chechnya was
11 murky at best; is that correct?

12 MR. SPERDUTO: I'm sorry.
13 The -- the information -- can you
14 read it back? I beg your pardon.

15 MR. COHEN: I -- I'll -- I'll
16 say it -- I'll ask the question
17 again.

18 Just give me a second.

19 (Pause.)

20 MR. COHEN: All right. Can we
21 take a few-minute break?

22 THE WITNESS: Absolutely.

23 MR. COHEN: Thank you.

24 THE VIDEOGRAPHER: The time is
25 4:37. We're going off the record.

1 RINAT R. AKHMETSHIN

2 Exhibit Number 202.)

3 - - -

4 BY MR. COHEN:

5 Q. Have you seen this document
6 before?

7 A. I have, sir, yes.

8 Q. Did you send this e-mail to
9 Peter Zalmayev on May 24th, 2011?

10 A. It does -- it does appear that
11 way, yes, sir.

12 Q. What was the purpose of this
13 e-mail?

14 A. It's actually a summary of
15 Russian media publications about
16 Mr. Egiazaryan.

17 Q. Why was it prepared?

18 A. Because we wanted to make sure
19 that we are covering comprehensively this --
20 Mr. Egiazaryan's track record.

21 Q. And -- and how -- who -- did you
22 contract someone --

23 A. I did.

24 Q. -- to do some research for you?

25 A. Yeah, I did, sir, yes.

1 RINAT R. AKHMETSHIN

2 Q. Who did you contract?

3 A. There's someone in Russia, just I
4 don't remember now. I -- I should go back,
5 but that's someone who was recommended to me
6 and that -- I think it's an organization,
7 some media organization, and -- but I did pay
8 for it.

9 Q. How much did you pay?

10 A. I think, like, \$3,000.

11 Q. And it's supposed to be a
12 comprehensive survey of research regarding
13 Mr. Egiazaryan?

14 A. I think so. There should be some
15 methodology how this research was conducted.
16 There it says, neutral, positive,
17 negative.

18 Q. Did you read this entire
19 document?

20 A. Not exactly, to be honest.

21 Q. Were you made aware by this
22 document of any anti-Semitic or
23 anti-American statements by Mr. Egiazaryan
24 or attributed to him?

25 A. I think there's something here

1 RINAT R. AKHMETSHIN

2 with him. There might have been.

3 I -- I do not -- to be honest,
4 it's been a long time since I got this. I
5 can --

6 MR. SPERDUTO: You're not
7 asking him to read this --

8 MR. COHEN: No, I'm not. I'm
9 asking him if he recalls any specific
10 anti-Semitic or anti-American
11 statements made by Mr. Egiazaryan or
12 attributed to him --

13 THE WITNESS: I think --

14 MR. COHEN: -- on this
15 document.

16 THE WITNESS: -- there's
17 something about anti-Semitic stuff.
18 It says that Ashot Egiazaryan in
19 Russian media history of scandals.

20 So --

21 BY MR. COHEN:

22 Q. I'm sorry. I didn't hear the
23 answer.

24 A. It's -- I -- I -- I do not
25 remember, sir. I could -- if you want me to,

1 RINAT R. AKHMETSHIN

2 I could review this document.

3 Q. No.

4 A. But I'm sure there was some stuff
5 here about anti-Semitism.

6 Q. And -- and this is exclusively
7 from newspaper articles; is that correct?

8 A. It says smee (phonetic). Smee in
9 Russia is like media, so it could be articles
10 and online newspapers.

11 Q. It could be blogs?

12 A. I think that at that time, it
13 could have been, yes. I'm not sure.

14 So there are a lot of articles
15 here from Novaya Gazeta. Everything is in
16 the public record. Let's put it that way.

17 Q. And if you had a specific
18 statement of an anti-Semitic or
19 anti-America -- a specific instance of an
20 anti-American or anti-Semitic statement, you
21 would have used it in your educational
22 efforts; is that correct?

23 A. I think we had enough for
24 education efforts, sir.

25 Q. Do you recall ever notifying any

1 RINAT R. AKHMETSHIN

2 journalist or anybody of any specific
3 anti-American or anti-Semitic statements by
4 Mr. Egiazaryan?

5 A. His presence on the party list of
6 LDPR was enough reason for us, sir --

7 Q. And that was --

8 A. -- I -- there might have been
9 some articles. I do not recall, sir.

10 Q. You don't recall, one way or
11 another, whether there was any articles of
12 anything other than an -- an -- an alleged
13 affiliation with the LDPR --

14 MR. SPERDUTO: Well, Jason --

15 BY MR. COHEN:

16 Q. -- is that correct?

17 MR. SPERDUTO: -- just -- just
18 a minute, please.

19 You're asking him about a
20 document that has 28 pages. It's
21 over -- what's that? -- seven or
22 eight months old.

23 And you're asking him if he can
24 recall what's in the document or is
25 it in the document?

1 RINAT R. AKHMETSHIN

2 Flip through and see if you
3 find anything.

4 THE WITNESS: There's this
5 whole Chapter 14. It's about
6 anti-Semitic links of the LDPR.

7 BY MR. COHEN:

8 Q. All right. The last question
9 that I asked was, if you had any specific
10 instance of an anti-American or anti-Semitic
11 statement, you would have included that in
12 -- in writing; is that correct?

13 MR. SPERDUTO: Hypothetical;
14 improper.

15 THE WITNESS: I think we
16 included what we knew for the best of
17 our knowledge, sir.

18 BY MR. COHEN:

19 Q. You included what you knew from
20 the best of your knowledge; is that correct?

21 A. I think whatever was
22 communicated, that was the stuff which was
23 based on due diligence. And if we have
24 referred to something, it has -- it must have
25 been sourced to something. That's -- that's

1 RINAT R. AKHMETSHIN

2 a fair thing to say. So we try to be very
3 fair.

4 Q. And if you found -- strike that.

5 Are you aware, in any of the
6 letters or materials that were prepared by
7 Mr. Zalmayev or by you, of any specific
8 anti-Semitic or anti-American statement by
9 Mr. Egiazaryan?

10 A. I think that -- I do not recall,
11 sir, one way or another -- I do not recall
12 one way or another, sir.

13 Q. I'm going to show you PZ2292,
14 which we'll mark as Exhibit 203.

15 - - -

16 (Whereupon, an e-mail was
17 marked, for identification purposes, as
18 Deposition Exhibit Number 203.)

19 - - -

20 MR. COHEN: I'm sorry. This
21 one.

22 BY MR. COHEN:

23 Q. Have you seen this document
24 before?

25 A. I do not recall, sir. I don't

1 RINAT R. AKHMETSHIN

2 believe so.

3 MR. COHEN: I'm going to mark
4 as Exhibit 204, PZ2911.

5 - - -

6 (Whereupon, an e-mail with
7 attachment was marked, for
8 identification purposes, as Deposition
9 Exhibit Number 204.)

10 - - -

11 THE WITNESS: Thank you.

12 BY MR. COHEN:

13 Q. Have you seen this before?

14 A. Yes.

15 Q. And did -- do you know who
16 prepared this compilation of materials?

17 A. I don't remember, but these are
18 compilation of articles.

19 Q. Do you know where you got it
20 from?

21 A. From Moscow, most likely. I
22 don't recall exactly.

23 Q. Do you know who -- who sent it
24 to you?

25 A. Maybe some journalist from Novaya

1 RINAT R. AKHMETSHIN

2 Gazata --

3 Q. Was --

4 A. -- these are articles from --
5 that's a compilation of articles.

6 Q. Was this part of your research
7 for -- for learning information about
8 Ashot Egiazaryan?

9 A. I'm sure it was part of it.

10 MR. SPERDUTO: This is 204,
11 right?

12 THE WITNESS: This is 204, yes.

13 BY MR. COHEN:

14 Q. I'm going to show you what's
15 been -- what has Bates Number PZ2718.

16 MR. COHEN: And we'll mark that
17 as Exhibit 205.

18 - - -

19 (Whereupon, an e-mail with
20 attachment was marked, for
21 identification purposes, as Deposition
22 Exhibit Number 205.)

23 - - -

24 BY MR. COHEN:

25 Q. What is this?

1 RINAT R. AKHMETSHIN

2 A. A summary of the articles.

3 Q. And who -- who -- who prepared
4 it?

5 A. I do not recall. I did receive
6 it from Russia, most likely, since it's in
7 Russian.

8 Q. I'm going to show you what
9 contains Bates Number PZ2781 --

10 - - -

11 (Whereupon, Russian document
12 was marked, for identification
13 purposes, as Deposition Exhibit
14 Number 206.)

15 - - -

16 THE WITNESS: Thank you.

17 BY MR. COHEN:

18 Q. -- which we'll mark as
19 Exhibit 206.

20 What is this?

21 A. It's the summaries of articles,
22 but, you know, I -- I might speculate -- I
23 cannot say for sure, but these are weekly
24 summaries of articles about Russian -- it's
25 not just Mr. Akhmetshin. There are other

1 RINAT R. AKHMETSHIN

2 people who are mentioned here.

3 But it might have been from
4 Mr. Markarian, because it's his client
5 matter.

6 Q. Well, whose -- what do you mean,
7 "his client"?

8 A. Europark was something which
9 Mr. Smagan was -- Mr. Egiazaryan allegedly
10 stole this property from Mr. Smagan.

11 And if this -- I -- I did not
12 prepare this statement, but if I did receive
13 it, it probably was from Mr. Smagan's
14 lawyers.

15 Q. And you don't have any specific
16 knowledge regarding or expertise regarding
17 the dispute between Mr. Egiazaryan and
18 Mr. Smagan, do you?

19 A. I do not know. It's just stuff,
20 it's articles.

21 Q. I'll show you what we'll mark as
22 Exhibit 207, which bears Bates Number 2849.

23 MR. COHEN: I'm sorry. Let
24 me --

25 - - -

1 RINAT R. AKHMETSHIN

2 (Whereupon, an e-mail with
3 attachment was marked, for
4 identification purposes, as Deposition
5 Exhibit Number 207.)

6 - - -

7 THE WITNESS: Thank you.

8 BY MR. COHEN:

9 Q. Have you seen that before?

10 A. I might have, yes.

11 Q. Do you know who prepared this?

12 MR. SPERDUTO: I'm sorry.

13 Which page are you talking about,
14 2849 or the subsequent pages?

15 MR. COHEN: The subsequent
16 pages.

17 BY MR. COHEN:

18 Q. Do you know who prepared the
19 report that's on the subsequent pages?

20 A. Summary. It could have been
21 Mr. Markarian's people, his law firm.

22 Q. You don't recall one way or the
23 other?

24 A. I -- I most likely -- I did not
25 write this. This I could tell for sure.

1 RINAT R. AKHMETSHIN

2 I do remember this document, yes.

3 Q. I'm going to show you what we'll
4 mark as Exhibit 208.

5 - - -

6 (Whereupon, series of articles
7 and papers was marked, for
8 identification purposes, as Deposition
9 Exhibit Number 208.)

10 - - -

11 BY MR. COHEN:

12 Q. Have you seen this before?

13 A. I do not remember, sir. But this
14 is just articles and papers.

15 Q. And who collected that?

16 A. It might have been Peter --
17 Mr. Zalmayev.

18 Q. And are you aware of any other
19 than I've -- anything other than what I've
20 shown you that constitutes written research
21 regarding Mr. Egiazaryan that you've seen?

22 A. I do not remember, sir. This
23 might -- there might be -- I'm sure there's
24 much, much more, because there's a lot of,
25 like, rubbish online and, you know, some

1 RINAT R. AKHMETSHIN

2 stuff which is absolutely outrageous.

3 But these are articles which we
4 probably can see that would be relevant, you
5 know, and just --

6 Q. Are you aware --

7 A. -- reports --

8 Q. -- of any other written or
9 collected compilations of articles or
10 research other than the ones that I've just
11 shown you?

12 A. I'm not sure, sir.

13 Q. You're not aware of anything?

14 A. I --

15 MR. SPERDUTO: He just talked
16 about the online stuff.

17 MR. COHEN: I said --

18 THE WITNESS: So there are --
19 there are -- I -- I compiled -- some
20 of the stuff was compiled or I
21 commissioned compilation of -- or
22 research --

23 BY MR. COHEN:

24 Q. Right.

25 A. -- the stuff.

1 RINAT R. AKHMETSHIN

2 And I read a lot of articles
3 myself, but these are stuff which I've
4 probably seen before. These are old articles
5 which we discussed two, three times in this
6 deposition already.

7 Q. Do you recall anything else that
8 you commissioned or received that contains a
9 compilation of media or articles regarding
10 Mr. Egiazaryan?

11 A. Not to the best of my
12 recollection, sir.

13 Q. Do you recall any other written
14 reports or other information regarding
15 Mr. Egiazaryan other than what we've seen in
16 this pile of materials that we've discussed?

17 A. I think I did -- I did
18 commission -- we mentioned it, but I haven't
19 seen this among these documents -- I did
20 commission a legal memo --

21 Q. Okay.

22 A. -- on Mr. Egiazaryan's
23 immigration matters.

24 Q. That's the Snelbecker memo?

25 A. Snelbeck- -- Ms. Snelbecker's --

1 RINAT R. AKHMETSHIN

2 Q. Okay --

3 A. -- memos.

4 Q. -- so anything -- other than the
5 Snelbecker memo, was there anything else
6 that you can recall that you commissioned
7 with regard to providing research or
8 materials on Mr. Egiazaryan?

9 A. It doesn't come to my memory
10 right now, but we've seen quite a few things
11 here, sir.

12 Q. There's quite a few things that
13 seems to be rela- -- does that seem to be
14 relatively comprehensive in terms of what
15 you recall?

16 A. I think that there are probably
17 over a thousand pages of serious documents.
18 I think it's pretty serious materials.

19 Q. I'm going to show you what's
20 been previously marked as Exhibit 83.

21 Have you seen this document
22 before?

23 A. Yes, I have, sir.

24 Q. What is it?

25 A. It's a -- it's a memo from

1 RINAT R. AKHMETSHIN

2 A. Could you please --

3 Q. Did you have a conversation with
4 Mr. Zalmayev as to how strong a case there
5 was to allege that -- to allege
6 anti-Semitism with regard to Mr. Egiazaryan?

7 A. We always -- we discussed this
8 issue of anti-Semitism of how strong or how
9 weak. We -- we established that Chechnya
10 thing was not -- we could not say with
11 certainty. So, therefore, we dropped this
12 matter and we focused on other matter.

13 Q. Did you conclude that you
14 couldn't make the anti-Semitism argument
15 with certainty?

16 A. I don't think so, sir.

17 Q. Okay. I'll call your attention
18 to Paragraph 17, which is on Page 484.

19 And do you see where it says, Not
20 an easy issue, largely circumstantial. It's
21 the party and its leader, Zhirinovsky?

22 A. Yes, I do read this, sir.

23 Q. And did you discuss -- does
24 that -- was that Mr. Zalmayev's position on
25 February 4, 2011?